CGB-CC-0696

Miracle Temple Deliverance Ministries, Inc

"Be Set Free, Healed & Made Whole"
Pastor Amanda Bryant

RECEIVED & INSPECTED

APR 5 - 2007

FOE-MAILROOM

March 30,2017

Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Petition for Exemption from Closed Captioning Requirements

Dear Sir/Madame:

On behalf of Miracle Temple Deliverance Ministries, Inc., Burgaw, NC, there are submitted herewith an original and two(2) copies of its Petition for Exemption pursuant to 47 CFG Section 79.1 9f)

If you need any additional information, please don't hesitate to contact our offices. Thanks for your prompt attention to this Petition. For Exemption.

Sincerely,

James A Bryant, Jr Church Administrator

401 N Wright Street P O Box 1042 Burgaw, NC 28425 Tel: (910) 259-3388 Fax: (910) 259-3392 Website: mtdm.org

APR 5 - 2007

Before the Federal Communications Commission Washington, DC 20554

In the Matter of:)
Miracle Temple Deliverance Ministries, Inc.	<u> </u>
Video Programming Accessibility)
Closed Captioning)

To: Deputy Chief, Policy Division, and Media Bureau:

Petition for Exemption from Closed Captioning Requirements

Miracle Temple Deliverance Ministries, submits this Petition of Exemption pursuant to 47 CFR section **79.1** (f) of the Rules and Regulations of the Federal Communication Commission.

In Implementation of section 305 of the Telecommunication Act of **1996** – Video Programming Accessibility, the commission established rules and implementation schedules for the closed captioning of video programming. In enacting section 713 Congress recognized that in certain limited circumstances the costs if caption may **impose** undue burden on video programming providers or owners and it authorized **the** commission to adopt appropriate exemptions. The **statute** requires the commission to consider the following factors:

- (1) The nature and cost of the closed caption for the programming
- (2) The impact on the operation of the provider or program owner;
- (3) The financial resources of the provider program owner
- **(4)** The type of operation provider or program owner.

A petition of exemption must be supported by sufficient evidence that demonstrate compliance with the requirements to close caption video program will **cause** an undue burden.

This petition provides sufficient evidence to determine undue burden as defined by congress to be "significant difficulty or expense". Outlined in Exhibit 1 are the Nature and Cost of the Closed Caption. The cost of Closed Caption (only this does not include air time) would be \$15,600 per year. The church current program air time is \$8320.00 per year. Our program is a public service and has little to no repeat value. As outlined in Exhibit 1 the cost of providing closed caption is a **187%** increase in what the ministry is currently paying to air its broadcast. This additional cost will impact our operation and will impose a significant increase in financial resources. The financial resources of the Miracle Temple Deliverance Ministries indicate no surplus in the budget to pay for the captioning services. WSFX Television and Apex Media (distributors of Programming) have not indicated there ability to offset or contribute to Captioning services. MTDM programming provides a vital service to the community. It teach the precepts and concepts of the Word of God, it provide encouragement to those who are oppressed or depressed, it provide deliverance from those who are in bondage to life's circumstance and situations, and it provide access to those who are homebound, indignant, or confined.

Furthermore, MTDM believes that the local, non-news exemption to the closed

captioning rules also applies to Miracle Temple Deliverance Ministries Broadcast. As

noted above, the program is produced and distributed locally, and the sermons of Miracle

Temple Deliverance Ministries and /or an unscripted talk show that Lives in Me with

Pastor Amanda Bryant are of primary local public interest. The episodes are not news,

they do not have repeat value, and the electronic newsroom technique is not available.

Notwithstanding the applicability of the exemption, we have filed this petition in

abundance of caution and for the purpose of establishing certainty.

Therefore this petition is respectfully submitted as shown by this petition and its

attachments, the Commission should grant a waiver of the closed captioning requirements

in this case, because requiring closed captioning would create an undue burden. The

costs of captioning would be excessively high and would have significant impact on

Petitioners operation.

Respectfully Submitted

James A Bryant, Jr

Church Administrator

Miracle Temple Deliverance Ministries

Exhibit 1

Miracle Temple Deliverance Ministries broadcast is locally produced weekly church worship services. Miracle Temple Deliverance Ministries is located in Burgaw, North Carolina. MTDM weekly broadcast is a one hour program aired at 6:00am in the mornings at 6:00am on Sunday Mornings. This weekly broadcast is aired in a local viewing area. It is a crucial part of our outreach ministries. It assists us in getting the good news (Gospel) in rural areas and people lives are being transformed through the Word of God that is broadcast through our weekly programming. It is part of our mission "the Great Commission". The Word of God is being broadcast in the prisons, in people homes and it is delivering, encouraging, and edifying the masses. MTDM is produced by volunteers that donate approximately 24 hours a week to produce our television broadcast. The value of the volunteer time is estimated to be \$360.00 per broadcast. The utilization of volunteers has allowed us to continue our programming and provide worship service to the many individuals that are thirsty for the Word of God. Miracle Temple Deliverance Ministries does not employ a broadcast media staff. Our broadcast team consist of members that volunteer there time to produce local programming and editing of media as a ministry. We currently have 24 hours of volunteer time per week to produce our one hour broadcast. We equate our current production cost per broadcast to be as follows:

Current Cost of MTDM Broadcast (per Broadcast)

Total Annual Cost	\$8320.00	
Total Cost (Current)	\$160.00	
Shipping	\$20.00	
Supplies	\$ 15.00	
WSFX Air Time	\$125.00	

Total Cost with Closed Caption (Per Broadcast)

WSFX	K Air Time	\$125.00
Suppl	ies	\$ 15.00
Shipp	ing	\$20.00
*Clos	ed Caption Services	\$300.00
Total Cost	(Cost with Closed Caption)	\$460.00

Total Annual Cost (with Closed Caption) \$23920.00

The cost of Closed Captioned Programming will increase our Broadcast Cost 187%. This increase imposes an undue burden on the ministry.

*Extensive research of Closed Caption services indicates that following cost factors to obtain closed caption on broadcast. There are a mirage of companies that provide the services. However the cost for the service is consistent. Of the many companies researched the three companies listed below prices were the most cost efficient. Nevertheless the cost efficient pricing increase our Broadcast cost 187%. The companies that were researched are as follows:

CCMaker 822 Guilford Avenue # 148 Baltimore Maryland 21202 1-800-527-0551 www.ccmaker.com	\$300 per 1 hour Broadcast(Attached Exhibit 1)
CPCweb 1010Rockville Pike #306 Rockville, Md 20852 1-800-977-6678 www.cpcweb.co	\$460.00 per 1 hour Broadcast (Attached Exhibit 1)

Visualdata \$500.00 per 1 hour Broadcast (Attached Exhibit 1)

145 West Magnolia Burbank, Ca 91502 818-558-3363 www.visuadatainc.com

The above reflect outsourcing broadcast production of closed captioning services. We currently operation our broadcast team with members volunteers. In-house production with closed captioning is not an alternative it would impose a significant burden.

Software, Equipment Cost and Staff would be as follows

Broadcast Media Staff	\$22,500.00
Software, Training and Equipment	\$ 8,500.00
AirTime	\$ 6,500.00
Total Cost of In-house Production with Captioning	\$35,000.00

Financial resources are not available as indicated on Financial Statement to pay staff and purchase equipment necessary to produce close caption programming.

Exhibit 1 Attachments are as follows:

Qutoes from Closed Caption Maker, CPC Web, and Visualdata Inc.,

Financial Statements

CLOSED CAPTION MAKER

822 Guilford Avenue #148 • Baltimore, MD 21202 E-mail: wGallant@CCmaker.com • Web Site: www.CCmaker.com 1-800-527-0551

FCC Requires 100% captioning starting 1/1/06.

We sell an entry level closed-captioning system. See details below, system is called ADDrollupCC-RT

NRB Show (National Religious Broadcasters)

Orlando FL, Feb 18,19,20 (exhibit dates) booth #1063 (tech lab)

Will be showing our entry-level closed-captioning system; cost \$2000.

This will be our 3rd year at the show.

We add closed-captions to the video you produce

Cost is \$6 per video minute plus \$50; includes encoding, videotape, and 2nd day FedEx.

Client will be sent an open-captioned VHS proof copy at no charge.

Client sends us a professionally produced "master video" on BetaSP, DV/DVcam, or DVCpro25

and we create a closed-captioned professional master on BetaSP or DVcam using roll-up captions.

Example: A ten minute video using 'roll-up captions' would cost \$110.

Add \$2/minute if verbatim script is not supplied.

Add \$4/minute if pop-up captions are used instead of roll-up captions.

N Spots

TV Spots are \$100 per spot (:10 to :60); plus \$50 for tapestock and shipping. Script must be supplied on disk or emailed. Turnaround is two business days.

Music Videos

Music Videos (up to 5 minutes) are \$175, includes BetaSP/DVcam videotape and shipping.

Script must be supplied on disk. Additional BetaSP/DVcam copy is \$35 (includes tape).

(We do not support DigiBeta decks)

Church 8130-minute Infomercials: \$200 for half-hour program.

Includes transcribing, tape, 2nd day shipping.

We do these a special way to reduce manpower; thus lower cost (We call it "just do it").

We transcribe it, format the text, email audio/text to client to proof, then make the CC master.

Meets FCC captioning requirements.

TECHNICAL DETAILS FOR PROFESSIONAL CAPTIONING

Our encoder (hardware which adds the captions on line-21) uses component video in/out.

DV formats: we can accept DV, DVcam, DVCpro25 and master to DVcam. (all are small or large cassettes).

"Do your own Captioning"

(units now in-stock!)

ADDrollupCC-RT (post-production only)

\$2,000 (hardware & software)

This captioning system integrates into your editing system and adds 'rollup' type captions to the video you produce. This configuration was designed to meet the closed-caption needs of a church, 30-minute infomercials, or in-house training videos; can be upgraded to the full **ADDrollupCC** system. This configuration adds closed-captions in real-time as you copy the video from your **EditingSystem/Deck** to your Record Deck.

The introductory price for **ADDrollupCC-RT** is \$2,000; this includes a professional line-21 closed-caption encoder manufactured by Link Electronics; encoder supports composite, s-vhs, and component video. The encoder connects between your EditingSystem/Deck and your Record Deck when creating the closed-captioned master. We suggest starting with **ADDrollupCC-RT** and upgrade to the full ADDrollupCC if needed (few clients have upgraded).

ADDrollupCC \$3,000 (hardware & software)

This system gives you more control over the captioning process. The system requires access to timecode which enables you to correct script/timing errors. It is a software upgrade from ADDrollupCC-RT.

(new 5/27/06)

To download ADDrollupCC-RT Demo, right click and do a 'Save Target As',

(you must unzip the tile and then do the install)

To download a diagram of the system. right click and do a 'Save Target As', this is a pdf file

Transcribing Service:

We do 'drafl level transcribing for \$50 per half-hour.

You use the Internet to send us an mp3/wma of the audio and we email back a text tile.

Churches in these cities are using ADDrollupCC-RT

Augusta (GA) *** Ball Ground (GA) *** Bedford (TX) *** Bronx (NY) *** Clinton (IA) *** Columbus (GA) *** Des Moines (IA) *** Duluth (GA) *** El Paso (TX) *** Goose Greek (SC) *** Harrisonburg (VA) *** Hattiesburg (MS) —Hinesville (GA) *** Knoxville (TN) *** Lansing (MI) *** Laurel (MD) *** Midland (TX) *** Odessa (TX) *** Pennsauken (NJ) *** Peoria (IL) *** Raleigh (NC) *** Spartanburg (SC) *** Vienna (WV) *** W. Hurley (NY) *** Waldorf (MD) *** Wichita (KS)

Add Captions to streaming video on the web!

(Windows Media Video, Quicktime, RealOne)

Captioning Windows Media Video

You put the video up on your server and we create the companion captioning file for the player.

Take a look at our demo using the Windows Media Player: (you need to turn captions 'on' on the WMP)

("Right-click and "open in new window") Do not double-click here.

Run Windows Media Player with demo

Run Video on IE page using the Windows Media Player

- If you are on a MAC or have problems, email me and I'll send you a CD of these files
- \$5 per minute of video; client supplies video file and a script file.

 Add \$2/minute if verbatim script is not supplied.

 (We have a lower price for 'course content videos' for colleges.)

iTunes & IPod Captioning (new 9/25/06)

This link will download a zipped file.

www.ccmakerftp.com/QT_iTunes_IPod2.zip

This captioned file will work with Quicktime (Mac/Pc) or iTunes (Mac/Pc) plus you can download it to an IPod. The text is very readable on an IPod.

Add Subtitles to DVDs using DVDStudioPro

Adding subtitles to a DVD you create in DVDStudioPro is not fun. DVDStudioPro includes a subtile editor but the process of using it is painfully slow. You create a subtile block, set the in/out timecode points, check the sync, then move onto the next subtile block. We just did the subtilling for a 20-minute DVD = it contained 316 subtille blocks!

A better and more cost effective way is for you to FTP us your videos in mp4, we create a STL subtile file which you import onto a subtitle track. You still have to make minor adjustments to some of the in/out points. You have the same options as if you had manually created the subtitles; font, font size, color, position (left/right/center), timecode inlout points.

We have a MAC with DVDStudioPro so that we can fully test the STL file before sending it to the client. We are a PC shop but purchased this system because there are so many horror stories on the Internet concerning DVDStudioPro and subtitles.

If you have an interest in this service, email me and 111 email you a 'test' STL file with instruction on how to place it on the subtitle track. You can use any video, the demo just illustrates how easy it is to use a STL subtitle file.

\$7 per minute of video; client supplies mp4 file and a script file, \$50 minimum.

"VHS videotapes used in the Classroom"

This unique college/university service was designed to make existing VHS videos in your school's library accessible to a deaf/hoh student. Client sends us a non-captioned VHS videotape and we return it unaltered plus an opencaptioned DVD. You can use this DVD to make VHS copies.

Cost is \$4 per video minute which includes transcribing, videotape, and shipping. We use roll-up type captions; this is the format "The History Channel" uses for their evening programming.

Thus, a 30-minute video is exactly \$120. The captions roll-up on the top of the screen or the bottom.

(K-12 only, we are trying a new process at a lower cost !!!) new 1/07

Our Customers

Home Depot (GA) *** DuPont (DE) *** Los Alamos Nat'l Lab (NM) *** USPS (TN, IL, MA, ME) *** NY Bar Association (NY) *** Colonial Insurance(SC) *** Unum InsuranceCompany (ME) *** I-Car Tech Ctr (W) *** Sanders/Lockheed (NH) *** US Dept Interior/BOR (ID) *** Albany Medical Center (NY) *** BAE Systems (NH) *** WNY Indep Living Project (NY)

University at Buffalo/Suny CAT/UB (NY) *** University of New Hampshire (NH) *** Bowdoin College (ME) *** University of Maine (ME) *** City College (NY) *** University of New Mexico (NM) *** Fitchburg State College (MA) *** SW Texas State University (TX) *** San Diego City College (CA) *— University of Wi - Extension (WI) *** Dartmouth College (NH) *** Salish Kootenai College (MT) *** NYU (NY) *** Univ of Iowa *** Marin CC (CA) *** CAL State - San Marcos *** Univ of DE *** Temple Univ (PA) *** NE Univ (MA) *** Penn State (PA) *** UC Berkeley (CA) *** San Diego State (CA) *— CSU - Chico *** Univ of VT *** Marymount Univ (VA) - MSU - Morehead (MN) *** College of the Holy Cross (MA) *** Renton Tech College (WA) *** American Univ (DC) *** Madonna Univ (MI) *** College of the Redwoods (CA)

Plus many small video production companies from Maine to California.

Contact

ClosedCaption Maker 822 Guilford Avenue, #148 Baltimore, MD 21202

1-800-527-0551

Website: www.CCmaker.com

E-Mail: wGallant@CCmaker.com

Website Created March 4,1996 ... Updated March 10,2007



Warning: htmlspecialchars(): charset "us-ascil" not supported, assuming iso-8859-1 in /usr/iocal/psa/home/vhosts/webmail/horde/imp/lib/MIME/Viewer/text.php on line 41

INSOY Compose Folders Options Search Help Addressbook Longit

INBOX Open Folder

INBOX: Price quote and Service Order Form

Move | Copy This message to

(83 of 128) **4**

Delete | Reply | Reply to All | Forward | Redirect | Blacklist | Message Source | Save as | Print

Back to INBOX ◀▶

Date: Thu, 22 Mar 2007 16:55:35 -0400

From: Greg Stoner < gstoner@cpcweb.com>

To: "darleneadams@mtdm.org" <darleneadams@mtdm.org>

Subject: Price quote and Service Order Form

Part(s): 2 CPCServiceOrderForm_2007.pdf application/pdf 3224.58 KB

Hello, Darlene-

it was good talking to you earlier today.

Quote-30 minute program Deliverable - DVD caption file (.scc) SULK RATES-Set-up Fee = \$50.00 Transcription and Roll-Up captioning = \$180 TOTAL COST PER SHOW = \$230.00

for 52 programs; \$11,960.00

Any questions about services or the software, feel free to call us

Please find the attached CPC Service Order Form.

Thanks, Greg Stoner Services Coordinator / Subtitle Editor 1010 Rockville Pike #306 Rockville, MD 20852 301-738-8487

800-977-6678 FAX 301-738-8488

<blocked::mailto:castoner@cccweb.comb gstoner@cccweb.com</pre>

<blocked::http://www.cpcweb.com/> www.cpcweb.com Windows Software: Mac Software: <blocked::http://www.maccaption.com/>

www.maccaption.com Software Support:

http://webmail.mtdm.org/horde/imp/message.php?index=2266

4/2/2007



Bid# 2870 Miracle Temple Deliverence Ministries Miracle Temple Deliverence Ministries Bid Date: 04/02/07

04/02/07 Page 1 of 1

Visual Data Media Services, Inc.

145 West Magnolia Burbank, CA 91502 Office: 818-558-3363 Fax: 818-846-1523

Description Qty Unit Rate Ext. Rate **Amount**

From DVCpro master, we will mate 1-BCSP CC Roll Up Master. If your master does not have a 'head format', we can add the Bars, Tone & Slate for \$25.00.

We can also ship you CC BCSP master to the s numerous tapes. and make 1 large shipment be				o masters here until	we have
Roll Up Captioning - 60:00 to BCSP					500.00
Closed Caption Roll-Up 30-60 MIN	1	1 Ea	395.00	395.00	395.00
Duplicate To BCSP - 31-60 MIN	1	1 Ea	55.00	55.00	55.00
CC Encoding and/or V-Chip 60 MIN	1	1 Ea	50.00	50.00	50.00
				Summary:	
		Roll Up C	Captioning - 60	:00 to BCSP	500.00
Shipping is billed separately					
			Bid Tot	al:	500.00

Miracle Temple Deliverance Ministries, Incorporated Fund and Expenditures January through December 2006

	Jan - Dec 06
Ordinary Income/Expense	
Income	
4010 · Tithes Income	200,328.86
4020 · General Offering Income	53,904.43
4030 · Media Ministry Income	7.114.57
4061 - Partner Donations	2,572.00
4052 • Radio/TV Ministry Income	805.70
4053 - Building FundIncome	5,257.01
4120 · Interest Earned	19.80
Total Income	270,102.37
Expense	
6030 · Flowers 6 Decorations	1,963.20
6110 · Automobile Expense	6,516.22
6120 - Bank Service Charges	684.37
6130 · Long Term Debt Ex-	5,235.05
6140 · Contributions 6160 · Dues and Subscriptions	4,459.14
6170 · Food & Beverage	10.00
6180 · Insurance	4,292.69
6230 · Taxes, Licenses and Permits	7,818.65 14.67
6250 · Postage and Delivery	960.75
6255 · Church literature	2,519.10
6260 · Printing and Reproduction	43.15
6270 - Professional Fees	795.65
6290 · Rent	200.00
6300 · Repairs 6 Maintenance	20,080.36
6335 · Lawn Maintenance	2,674.53
6340 · Telephone	9,153.14
6350 · Travel & Ent	1,957.60
6390 · Utilities	12.862.91
6450 · Contract Labor	2,167.50
6530 - Benevolence 6540 - OutReach	5.125.42
6550 - Office Supplies	2,292.29
6560 · Payroll Expenses	1, 475.86 126,777.44
6670 · Program Expense	7,928.85
6690 · Music Ministry	2,651.50
6700 DanceMinistry	501.79
6770 Supplies	6.696,53
6800 · Equipment Expense	9,722.23
6900 Radio Minstry Expense	3,720.54
7000 • TV Ministry Expense	8.653.05
7041 .Administrative Travel	2,257.94
7042 - Administration Supplie	4,019.07
7100 · Advertising	209.50
Total Expense	266,640.89
Net Ordinary Income	3,461.48
Other Income/Expense	
Other Income	
7010 · Interest Income	0.36
Total Other Income	0.36
Net Other Income	0.36
Net Income	3,461.84

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Open Foider INBOX

INBOX: Price quote and Service Order Form (83of 128) 🖸

Move | Copy This message to 4

Delete | Reply | Reply to All | Forward | Redirect | Blacklist | Message Source | Save as | Print

Back to INBOX

Date: Thu, 22 Mar 2007 16:55:35 -0400 From: Greg Staner < gstoner@cpcweb.com>

To: "darleneadams@mtdm.org" <darleneadams@mtdm.org>

Subject: Price quote and Service Order Form

Part(s): 2 CPCServiceOrderForm_2007.pdf application/pdf 3224.58 KB

Hello, Darlene-

It was good talking to you earlier today.

30 minute program

Deliverable - DVD caption file (.scc)

BULK RATES-

Set-up Fee = \$50.00

Transcription and Roll-Up captioning = \$180

TOTAL COST PER SHOW = \$230.00

For 52 programs;

\$11,960.00

*You may want to consider buying our captioning software.

It's state-of-the-art, easy to use and 1/2 the cost of having us

caption your 52 programs.

From the home page of our web site (links below),

simply click on the Downloads link (on the left-hand side of the screen) to download a demo version.

For prices, just click on the Prices link.

Any questions about services or the software, feel free to call us.

Please find the attached CPC Service Order Form.

Thanks,

Greg Stoner

Services Coordinator / Subtitle Editor

1010 Rockville Pike #306

Rockville, MD 20852

301-738-8487

800-377-6678

FAX 301-738-8488

<blocked::mailto:gstoner@cpcweb.com> gstoner@cpcweb.com

Windows Software:

<blocked::blocked:fhttp://www.cpcweb.com/> www.cpcweb.com

Mac Software:

<blocked::blocked::http://www.maccaption.com/>

www.maccaption.com Software Support:

GENERAL AFFIDAVIT

State of North Carolina

County of Pender BEFORE ME the undersigned Notary. on this James A. Briantido 2057, personally appeared James Bryant, known to me to be a credible person and of lawful age, who being by me first duly sworn, on his oath, attests to and affirms the above facts. 803 Linda Lane Burgaw, NC 28425 BEFORE ME, the undersigned Notary. on this 30
2007 personally appeared Amanda W. Bryant, known to me to be a credible person and of lawful age, who being by me first duly sworn, on her oath, attests to and affirms the above facts. Amanda W. Bryant 803 Linda Lane Burgaw, NC 28425 Subscribed and sworn to before me, this 30 day of March 2007 (Signature of Notary Notary **NOTARY PUBLIC** public My commission expires: